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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RYAN Q. CLARIDGE,

Plaintiff,

vs.

I-FLOW CORPORATION, a Delaware
corporation; I-FLOW, LLC, a Delaware limited
liability company; DJO LLC (f.k.a. DJ
ORTHOPEDICS, LLC), a Delaware limited
liability company; DJO, INCORPORATED, aka
DJO, INC., a Delaware corporation; STRYKER
CORPORATION, a Michigan corporation; and
STRYKER SALES CORPORATION, a
Michigan corporation,
Defendants.

CASE NO.: 2:18-cv-01654-GMN-BNW

**AGREED ORDER REGARDING
PRODUCTION OF DOCUMENTS**

This matter coming before the Court on Plaintiff's, Ryan Q. Claridge, and Stryker Corporation, Stryker Sales Corporation, and I-Flow, LLC (collectively as "Defendants"), joint motion for entry of agreed order regarding Google LLC's ("Google") production of certain communications, the Court FINDS and ORDERS as follows:

1. Ryan Q. Claridge is the registered account holder and/or sole authorized user of a Gmail account with the address ryanclaridge71@gmail.com ("Google Account").

1 2. Ryan Q. Claridge consents to Google delivering and divulging the contents of his
2 respective Gmail accounts as described further below. The court finds that this consent is
3 sufficient pursuant to the Stored Communications Act 18 U.S.C § 2701 *et seq.*

4 3. Within three (3) days of the entry of this Order, counsel for Defendants will email
5 to the user (ryanclaridge71@gmail.com) a copy of this Order.

6 4. Within ten (10) days of the entry of this Order, Ryan Q. Claridge shall send an
7 email message from the user's Gmail account listed above to google-legal-support@google.com
8 with this Order attached ("Consent Email"). The Consent Email shall state that the user consents
9 to Google's disclosure of the communications dated between January 1, 2004 and December 1,
10 2020 GMT/UTC associated with the Google Account, which are in the Google Account, were
11 recently deleted from the Google Account, or were preserved pursuant to the request(s) in this
12 matter (the "Documents").

13 5. The Consent Email shall further state that the user consents to Google delivering
14 the Documents to:

15 Kristine Kuzemka, Esq.
16 Advanced Resolution Management
17 6980 S. Cimarron Road, Suite 210
18 Las Vegas, NV 89113

19 6. Within ten (10) days of the receipt of the Consent Email, Google shall write or
20 otherwise record the Documents, to the extent any exist and are reasonably available, on a
21 separate compact disc (CD) or other fixed medium and mail via overnight courier to:

22 Kristine Kuzemka, Esq.
23 Advanced Resolution Management
24 6980 S. Cimarron Road, Suite 210
25 Las Vegas, NV 89113

26 7. Google's production, as outlined in paragraph 6, will complete Google's discovery
27 obligation in this matter.
28

1 DATED this 1st day of December, 2020.

2 ER INJURY ATTORNEYS

3 /s/ Corey M. Eschweiler

4 Corey M. Eschweiler

5 DEWSNUP KING OLSEN WOREL

6 HAVAS MORTENSEN

7 /s/ Colin P. King

8 Colin P. King

9 **IT IS SO ORDERED**

10 **DATED:** 9:40 am, December 07, 2020

11 

12 **BRENDA WEKSLER**

13 **UNITED STATES MAGISTRATE JUDGE**

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **AGREED ORDER REGARDING PRODUCTION OF DOCUMENTS** by the method indicated below and addressed as follows:

- ☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

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